

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ARTEC EUROPE S.À.R.L.,

Plaintiff,

v.

SHENZHEN CREALITY 3D
TECHNOLOGY CO., LTD., AND
KICKSTARTER, PBC,

Defendants.

Civil Action No.: 1:22-1676 (WFK)(VMS)

DECLARATION OF HAILONG TANG

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I, Hailong Tang, declare:

1. I am general manager at Seagon IP and am based in Beijing, China. Seagon specializes in protection of intellectual property rights and investigation into IP infringements.

2. I provide this Declaration in support of Artec's reply memorandum in support of Artec's Application for a Temporary Restraining Order and Preliminary Injunction. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, I could and would testify completely to such facts under oath.

3. In 2018, I was retained by Artec Europe S.a.r.l. (Artecö) to investigate a Chinese company called Shenzhen Jimuyida Technology Co., Ltd. (Jimuyidaö) and its affiliates. As part of my investigation, I attended two tradeshows in the cities of Chengdu and Shanghai, where Jimuyida exhibited and demonstrated its 3D scanners (Magic Wand) and software, and I visited the office of Jimuyida's affiliate in the city of Wuhan and Jimuyida's office in the city of Shenzhen and its 3D workshop in the city of Dongguan.

4. On June 27, 2018, I visited Jimuyida's Wuhan office, which is managed under the name of Wuhan Ruler Technology Co., Ltd. (Wuhan Ruler or Chizi Technology). There, I met with Mr. Jian Yao, who was then Chairman of Board of Directors of Wuhan Ruler, and the Chief Technology Officer (CTO) and a shareholder of Jimuyida. I expressed interest in Jimuyida's 3D scanners and software, and asked him questions about them. I had placed an order for two 3D scanners (Magic Wand) from Jimuyida on June 8, 2018. At the meeting, Mr. Yao told me that Jimuyida had bought scanners and software from Artec, and that Jimuyida had analyzed and studied the company's 3D products in great detail, so that Jimuyida could learn as much as possible about how to make its own 3D products. I recorded the conversation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 6th day of April, 2022 in Beijing, China.

Hailong Tang

Hailong Tang
